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December 10, 2007

The Hon. Gerard E. Lynch  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York  
VIA E.C.F.

Re.: **United States v. Michael Bass**  
**07 Cr. 887 (GEL)**

Dear Judge Lynch:

Please accept this submission as a request to modify Michael Bass' bail conditions.

At the present, the defendant has a 9:00 p.m. curfew. The defendant requests removal of any curfew in light of work requirements this time of the year. I have spoke to U.S.P.O. Xiomara Rojas who is supervising the defendant while at liberty. She informs me that the defendant is in full compliance with his bail conditions and that there is no need for a curfew and that she has no objection to removal of same.

I have spoken to A.U.S.A. Marissa Mole regarding this application, she in turn spoke to Ms. Rojas, and as a result the Government has no opposition to curfew removal in light of Ms. Rojas' position

Therefore, the Court is respectfully asked to remove the curfew as a condition of the defendant's bail.

Respectfully Submitted,

Christopher Booth  
Attorney For Michael Bass

\*ADMITTED TO PRACTICE IN NEW YORK AND NEW JERSEY

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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THE UNITED STATES OF AMERICA

:

INDICTMENT NO:  
06 Cr.428 (SWK)

against

:

KIRSIX DE LA CRUZ,

JUDICIAL  
SUBPOENA

:

Defendant(s)

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TO: New York City Police Department  
Document Production Unit  
Subpoena Department  
One Police Plaza, Room 110C  
New York, New York 10038  
Tel: 646-610-5296

GREETINGS:

WE COMMAND YOU, That all business and excuses being laid aside, you and each of you appear and attend before United States District Court Judge **SHIRLEY WOHL KRAM, of the United States District Court for the Southern District of New York, located at 500 Pearl Street, on the 10th day of September, 2007, at 9:30 o'clock in the forenoon, at any recessed or adjourned date to give testimony in this action on the part of the DEFENDANT**

By providing a **complete copy of Kirsix De La Cruz's entire personnel file.**

In lieu of appearing on the date above, compliance with this subpoena may be made by providing said copy to Christopher Booth, attorney for Kirsix De La Cruz as identified below

Failure to comply with this subpoena is punishable as a contempt of court and shall make you liable to the person on whose behalf this subpoena was issued for a penalty not to exceed fifty dollars and all damages sustained by reason of your failure to comply.

WITNESS, Hon. Shirley Wohl Kram United States District Court  
Judge for the Southern District of New York at 500 Pearl Street,  
on this <sup>th</sup> day of September, 2007.

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U.S.D.J.

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